

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MIGUEL ANGEL RODRIGUEZ RODRIGUEZ * CASE NO. 11-05769 BKT
ERICA PEREZ RODRIGUEZ

Debtors

CHAPTER 13

BPPR as Servicing Agent of Oriental Bank
& Trust

Movant

MIGUEL ANGEL RODRIGUEZ RODRIGUEZ
ERICA PEREZ RODRIGUEZ
ALEJANDRO OLIVERAS RIVERA, TRUSTEE

Respondent (s) _____

DEBTORS' INFORMATIVE MOTION
RE: PAYMENTS MADE TO SECURED CREDITOR/MOVANT
AND REQUEST FOR ORDER DENYING MOTION FOR RELIEF FROM STAY
DOCKET NO. 66

TO THE HONORABLE COURT:

NOW COME, MIGUEL ANGEL RODRIGUEZ RODRIGUEZ and ERICA PEREZ RODRIGUEZ, debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. On February 12, 2013, the Court granted the debtors thirty (30) days within to cure any and all arrears owed to movant BPPR, docket no. 77, and inform the Court accordingly, and upon failure to comply, the stay is lifted automatically. *Minutes of Hearing on Motion to Lift the Stay*, docket no. 77.

2. Attached is evidence of payment made on this same date, March 12, 2013, in the sum of \$4,292.88, to BPPR as servicing agent of Oriental Bank & Trust. This payment cures any and all post-petition mortgage loan arrears, late charges, costs, and legal fees.

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Debtors' Informative Motion and Request for Order
Case no. 11-05769 BKT13

3. Based on the aforesated, debtors hereby respectfully request this Honorable Court be informed of the foregoing and deny the motion to lift the automatic stay filed by BPPR, docket no. 66, in the above captioned case.

WHEREFORE, debtors respectfully request from this Honorable Court be informed of the foregoing and deny BPPR's motion requesting the lifting of the automatic stay, docket no. 66, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq., Vivian Ortiz Ponce, Esq., Cardona Jimenez Law Office, Counsel for BPPR; I also certify that a copy of this motion was sent via US Mail to: Miguel A Rodriguez and Erica Perez Rodriguez, HC 50 Box 23882 San Lorenzo PR 00754, debtors in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 12th day of March, 2013.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONERS/RESPONDENTS
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX NO 787-746-5294
Email: rfigueroa@rfclawpr.com

21-14-3774B 06-2005

Bank of America

Cashier's Check

No. 2016054

Notice to Purchaser: In the event this check is lost, misplaced or stolen, a sworn statement and 90-day waiting period will be required prior to replacement. This check should be negotiated within 90 days.

Date **MARCH 05, 2013**

30-1/1140
NTX

Banking Center **CHICOPPE**

0056625 00002 0002016054

MIGUEL RODRIGUEZ AND ERICA PEREZ
Remitter (Purchased By)

\$ ****4292.88****

Pay ****FOUR THOUSAND TWO HUNDRED NINETY TWO DOLLARS AND 88 CENTS****

To The Order Of ****ORIENTAL MORTGAGE****

Marybeth Zellerbach
Authorized Signature

Bank of America, N.A.
San Antonio, Texas

VOID AFTER 90 DAYS

⑈ 2016054 ⑈ ⑆ 114000019 ⑆ 001641005339 ⑈

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